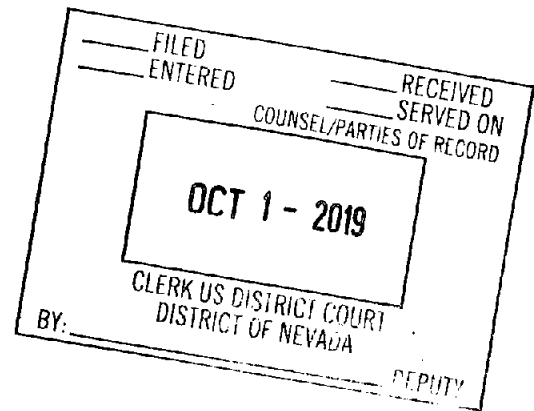


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Attorneys for the Plaintiff



**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**-oOo-**

UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

ETHAN ELLIOT ERHARDT,

DEFENDANT.

**CRIMINAL INDICTMENT**

2:19-cr- *249*

**VIOLATIONS:**

18 U.S.C. §§ 922(a)(6) and 924(a)(2) –  
Illegal Acquisition of a Firearm

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

(Illegal Acquisition of a Firearm)

On or about February 19, 2019, in the State and Federal District of Nevada,

**ETHAN ELLIOT ERHARDT,**

1 defendant herein, in connection with the acquisition of firearms, to wit: 10 Fabrique Nationale  
2 Herstal (FN), M249S, 5.56 caliber rifles, bearing serial numbers M249SA01897, M249SA02436,  
3 M249SA05447, M249SA07101, M249SA07099, M249SA07141, M249SA07111, M249SA07588,  
4 M249SA07367, M249SA07431; from "Green Valley Range," a licensed dealer of firearms within  
5 the meaning of Chapter 44 of Title 18, United States Code, knowingly made and caused to be made  
6 a false and fictitious written statement to "Green Valley Range," which statement was intended and  
7 likely to deceive "Green Valley Range" as to a fact material to the lawfulness of the sale of said  
8 firearms under Chapter 44 of Title 18, United States Code, in that ETHAN ELLIOT ERHARDT  
9 did complete and execute a Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473  
10 Firearms Transaction Record, wherein ETHAN ELLIOT ERHARDT represented that he was the  
11 actual transferee/buyer of the firearms, when in fact, ETHAN ELLIOT ERHARDT was not the  
12 actual transferee/buyer of the firearms, all in violation of Title 18, United States Code, Sections  
13 922(a)(6) and 924(a)(2).  
14  
15

16  
17 **DATED:** this 1st day of October, 2019.

18 **A TRUE BILL:**

19 /S/

20 FOREPERSON OF THE GRAND JURY

21  
22 NICHOLAS TRUTANICH  
United States Attorney

23  (for)

24 DANIEL CLARKSON  
25 Assistant United States Attorney  
26  
27  
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